

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<p><b>Consumer Finance Protection Bureau,</b></p> <p style="text-align: center;"><b>Plaintiff,</b></p> <p style="text-align: center;">v.</p> <p><b>Navient Corporation, <i>et al.</i>,</b></p> <p style="text-align: center;"><b>Defendants.</b></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p><b>Civil Action No. 3:17-cv-00101-RDM</b> <b>(Hon. Robert D. Mariani)</b></p>
--	---	--

**DECLARATION OF NATALIE BILBROUGH**


I, Natalie Bilbrough, declare as follows:

1. I am an associate at Wilmer Cutler Pickering Hale and Dorr, LLP, and one of the counsel for Defendants Navient Corporation, Pioneer Credit Recovery, Inc., and Navient Solutions, LLC. I am admitted *pro hac vice* in this action. This declaration is based on my personal knowledge and my review of the documents described below.

2. On July 16, 2020, the CFPB submitted Plaintiff's Response To Defendants' Statement of Undisputed Material Facts In Support of Defendants' Motion For Summary Judgment ("PRSUF"). The CFPB included Defendants' statements of fact in the PRSUF. After removing Defendants' statements, the PRSUF totals 305 pages and 69,895 words.

3. Screen Shot 5, attached as Exhibit A, is a true and accurate copy of a screenshot of Screen 151 (Borrower Correspondence History) of the Consolidated Loan Administration Servicing System ("CLASS") as it appeared on August 28, 2018. Screen Shot 5 was taken under my supervision and at the request of counsel for the CFPB during its two-day site visit of Navient Solutions, LLC. Screen Shot 5 was produced to the CFPB on August 31, 2018.

I declare under penalty of perjury that the foregoing is true and correct. Executed  
on August 13, 2020.

  
Natalie Bilbrough

# **EXHIBIT A**

Screen Shot 5

